



DEPARTMENT OF THE TREASURY

Internal Revenue Service

26 CFR Part 301

[REG–123652-18]

RIN 1545–BP01

Treatment of Special Enforcement Matters; Hearing

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Proposed rule; notice of hearing.

SUMMARY: This document provides a notice of public hearing on proposed regulations to except certain partnership-related items from the centralized partnership audit regime that was created by the Bipartisan Budget Act of 2015 and sets forth alternative rules that will apply.

DATES: The public hearing is being held on Thursday March 25, 2021 at 10:00 a.m. The IRS must receive speakers' outlines of the topics to be discussed at the public hearing by Friday, March 12, 2021. If no outlines are received by March 12, 2021, the public hearing will be cancelled.

ADDRESSES: The public hearing is being held by teleconference. Individuals who want to testify (by telephone) at the public hearing must send an email to publichearings@irs.gov to receive the telephone number and access code for the hearing. The subject line of the email must contain the regulation number [REG–123652-18] and the word TESTIFY. For example, the subject line may say: Request to TESTIFY at Hearing for REG–123652-18. The email must include the name(s) of the speaker(s) and title(s). Send outline submissions electronically via the Federal eRulemaking Portal at www.regulations.gov (IRS REG–123652-18). The outlines must be received by

March 12, 2021 at www.regulations.gov, no outlines are being accepted by email.

FOR FURTHER INFORMATION CONTACT: Concerning these proposed regulations, Concerning the proposed regulations, Jennifer M. Black of the Office of Associate Chief Counsel (Procedure and Administration), (202) 317–6834, the hearing, and the access code to attend the hearing by teleconferencing, Regina Johnson at (202) 317–5177 (not toll-free numbers) or publichearings@irs.gov. If emailing please put Attend, Testify, or Agenda Request and [REG–123652-18] in the email subject line.

SUPPLEMENTARY INFORMATION: The subject of the public hearing is the notice of proposed rulemaking REG–123652-18 that was published in the **Federal Register** on Tuesday, November 24, 2020, 85 FR 74940.

The rules of 26 CFR 601.601(a)(3) apply to the hearing. Persons who wish to present oral comments telephonically at the hearing that previously submitted written comments by January 25, 2021, must submit an outline on the topics to be addressed and the amount of time to be devoted to each topic by March 12, 2021.

A period of 10 minutes is allotted to each person for presenting oral comments. After the deadline for receiving outlines has passed, the IRS will prepare an agenda containing the schedule of speakers. Copies of the agenda will be made available (two days before the hearing) by emailing your request to publichearings@irs.gov. Please put “REG–123652-18” Agenda Request” in the subject line of the email.

Individuals who want to attend (by telephone) the public hearing must also send an email to publichearings@irs.gov to receive the telephone number and access code for the hearing. The subject line of the email must contain the

regulation number [REG–123652-18] and the word ATTEND. For example, the subject line may say: Request to ATTEND Hearing for REG–123652-18. The email requesting to attend the public hearing must be received by 5:00 P.M. two (2) business days before the date that the hearing is scheduled.

The telephonic hearing will be made accessible to people with disabilities. To request special assistance during the telephonic hearing please contact the Publications and Regulations Branch of the Office of Associate Chief Counsel (Procedure and Administration) by sending an email to publichearings@irs.gov (preferred) or by telephone at (202) 317–5177 (not a toll-free number) at least three (3) days prior to the date that the telephonic hearing is scheduled.

Any questions regarding speaking at or attending a public hearing may also be emailed to publichearings@irs.gov.

Crystal Pemberton,
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Publications and Regulations Branch,
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